

United States Bankruptcy Court
Eastern District of Pennsylvania

In re Tatyna Petrosov

Debtor

Case

No.

Chapter

19-16061/amc

13

**RESPONSE TO MOTION FOR RELIEF OF
THE BANK OF NEW YORK MELLON ET AL**

Debtor, Tatyna Petrosov by her counsel, Bradly E. Allen files this Response and avers the following:

1. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
2. Admitted. It is admitted that debtor is the owner of the premises of 6935 Shelbourne St., Philadelphia, PA 19111. However, Dmitry Kozlov is deceased.
3. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
4. Admitted.
5. Denied. Co-debtor, Dmitry Kozlov is deceased.
6. Denied. The averment in this paragraph is a legal conclusion to which no response is required.
7. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
8. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
9. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
10. Denied. It is specifically denied that debtor has failed to make the monthly post-petition mortgage payments in the amount of \$976.33 for the months of February 2022 through July 2022. . To the contrary, debtor has made all of her post-petition mortgage payments
11. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
12. Denied. The averment in this paragraph is a legal conclusion to which no response is required.
13. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor requests this Honorable Court deny the Motion for Relief of The Bank of New York Mellon et al.

Respectfully submitted,

/s/Bradly E. Allen, Esquire
Attorney for Debtor, Tatyna Petrosov

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Tatyna Petrosov**

Debtor

Case No. Chapter 19-16061/AMC
13

ORDER

AND NOW, this _____ day of _____, 2022 upon Motion of

The Bank of New York Mellon, et al Motion for Relief from the Automatic Stay

and Debtor's Response it is hereby:

ORDERED that the Motion for Relief of The Bank of New York Mellon, et al is denied.

HONORABLE ASHLEY M. CHAN
U.S. BANKRUPTCY JUDGE